

Delta Telecom, Inc.  
7881 Tuscany Dr.  
Poland, OH 44514

February 25, 2011

The Honorable Marlene H. Dortch  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Room TW-A325  
Washington, DC 20554

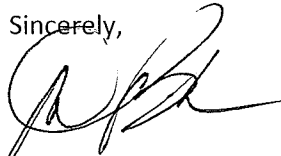
RE: EB-Docket No. 06-36  
Annual 64.2009 CPNI Certification for 2010  
Filer ID: 825941

Dear Secretary Dortch:

Enclosed please find Delta Telecom Inc's original executed Annual 64.2009 CPNI Certification for 2010.

Please call me directly at (330)990-5004 if you should have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'MB', is written over the word 'Sincerely,'.

Millie Baldwin  
President

Annual 47 C.F. R. & 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010

Date Filed: February 25, 2011

Name of Company Covered under this certificate:

Delta Telecom, Inc.

7881 Tuscany Dr.

Poland, OH 44514

Form 499 Filer ID: 825941

Name of Signatory: Millie Baldwin

Title of Signatory: President

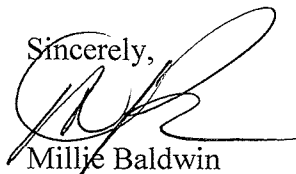
I, Millie Baldwin, certify that I am the officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47.C.F.R. & 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commissions's rules.

Delta Telecom has not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year because Delta Telecom has had no business relation with data brokers in the past year. Delta Telecom will report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps Delta Telecom is taking to protect CPNI if any business is done with data brokers in the future.

Delta Telecom has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Sincerely,

A handwritten signature in black ink, appearing to be 'MB', written over the word 'Sincerely,'.

Millie Baldwin

Delta Telecom, Inc.  
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Poland, OH 44514  
(330)990-5004

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**Statement explaining how Delta Telecom, Inc. is in Compliance with the Requirements set forth in section 64.2001 et seq. of the Commissions's rules.**

**Safeguarding CPNI**

Delta Telecom's protection of CPNI :

Customer initiated telephone contacts – callers must have the account number, billing name & address, and name of individual on file.

Passwords for telephone access to call detail

If caller requests call detail information, Delta Telecom will mail a duplicate phone bill to the address on record. All customer information is maintained in a password protected database that can be accessed only by authorized employees.

Delta Telecom does not have an online account access

In store visits

Customers must have valid photo identification for being an authorized person on the account.

Opt-out/in approval customer approval

Delta Telecom does not work with any agents or marketing companies. Its employees are the only individuals that have access to customer authorized access to CPNI information. Delta Telecom has a policy of providing to customers written CPNI notices and seeks to obtain approval from each customer to use CPNI for marketing purposes. Delta Telecom also provides existing customers with the ability to rescind their consent to the use of their CPNI at any time. Delta's CPNI notices explain the customers' CPNI rights in accordance with the FCC's CPNI rules, including their right to restrict the use and disclose of, and access to their CPNI. These notices also include information on our customers' right to choose to not receive marketing from Delta that is based upon Delta's use of their CPNI.

#### Training employees and express disciplinary process

Delta Telecom has a strict training process for protecting CPNI information. If an employee does not follow any of its policies the employees are reprimanded and are subject to termination of their employment with Delta Telecom. All of Delta Telecom employees who have access to CPNI receive training about CPNI compliance. All employees are required to maintain the confidentiality of all information including customer information that is obtained as a result of their employment with Delta Telecom. Employees are required to sign a company handbook as a condition of employment detailing how employees are expected to treat any confidential information.

#### Notice Requirements

##### Notification to law enforcement upon breach

Delta Telecom will notify the United States Secret Service (USSS) and Federal Bureau of Investigation (FBI) of any breach of its customer's CPNI within five days.

Delta Telecom shall notify law enforcement within five days of any breach of its customer's CPNI. After completing the process of notifying law enforcement and unless directed otherwise, Delta Telecom will notify customers in a manner that conforms to the relevant FCC rules. Delta Telecom will maintain a record of any CPNI related breaches for a period of at least two (2) years.

##### Notice of account changes

Delta Telecom will mail the address of record any password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record that is created or changed.

##### Notification before use of CPNI

Prior to any solicitation for customer approval, Delta Telecom will provide notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI. When using the customer's approval, Delta Telecom will use an individual notice in a manner that conforms to FCC rules.

##### Contents of notice

The notice will include that the customer has the right and carrier has the duty to protect the confidentiality of CPNI. A description of what constitutes a CPNI, which includes their right to disapprove these uses and their right to withdraw use at any time.

Notices will also provide steps in which to grant or deny access to CPNI and that denial of approval will not affect provisioning of any services that customer subscribes to. Customers are made aware that all notices will remain in effect until revoked by customer or limited by customer of either their approval or denial.

Any solicitation to customer by Delta Telecom will be in accordance to customer's CPNI rights.

## **Record Keeping Requirements**

### **Establishing a Password**

Authentication of a password by the customer is required. Backup methods are used if password is forgotten. For example, the last payment on the account must be provided.

A new password is required if the customer is unable to provide either the password or back up.

### **Records of related breaches**

Delta Telecom will maintain for a minimum of two years any records of breaches and notices to USSS and FBI.

### **Records of Approval**

Delta Telecom will maintain for a minimum of one year records of customer approval of CPNI.

### **Records of Notification**

Delta Telecom will maintain for a minimum of one year records of customer notices of customers rights to restrict CPNI.

### **Records of Marketing Campaign using CPNI**

Delta Telecom will maintain for a minimum of one year records of any marketing campaigns specific to the CPNI used and the products and services offered.

### **Records of Supervisory Review Process**

Delta Telecom will maintain for a minimum of one year the records for the supervisory review for outbound marketing. All sales personnel are required to obtain supervisory approval prior to any outbound marketing requests for customer approval.